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October 20, 2004

Ali Bahrami
Federal Aviation Administration (FAA)
Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW. Nassif Building Room PL-401
Washington, DC 20590

FAA-2004-19140-7

Subject: 757 Mid spar fitting inspection – Notice of Proposed Rulemaking

Ref: (a) NPRM Docket No. 2004-19140, Directorate Identifier 2004-NM-84-AD.
(b) Boeing Service Bulletin 757-54-0042 Dated May 13, 1999

Dear Mr. Ali Bahrami:

United Parcel Service, Co. (UPS) has reviewed the subject NPRM (Notice of Proposed Rulemaking), applicable to 757 series airplanes powered by Pratt & Whitney engines. We request the suggestions below be considered during the final rule making process.

Under the compliance section, the NPRM will require inspection of the mid spar fitting for evidence of corrosion and cracking within 18 months from the effective date of the AD (Airworthiness Directive) on any airplane over 10 years of age. The reference NPRM, states under "Related Rulemaking", that AD 2003-18-05 required modification of the nacelle strut and wing structure at a threshold of 37,500 total flight cycles. AD 2003-18-05 states to modify the nacelle strut at a threshold of 29,000 total flight cycles not 37,500 total flight cycles for the 757-200PF series airplanes.

Although the intent of the service bulletin is to address an unsafe condition, there are several errors in the bulletin that need to be addressed prior to mandating the actions specified to prevent unnecessary requests for Alternate Methods of Compliance. First, the NPRM states to inspect Pratt and Whitney powered airplanes identified in service bulletin 757-54-0042. The service bulletin lists Pratt and Whitney powered aircraft as well as Rolls Royce powered airplanes. We believe that the service bulletin should only address Pratt and Whitney powered airplanes. The service bulletin also list incorrect part numbers and quantity of parts needed to accomplish the work. Boeing has addressed these issues with Information Notices but has also stated that the notices have not been approved by a regulatory agency.

The service bulletin and the NPRM direct the operators to look for staining around the mid spar fitting as an indication for corrosion. Although staining (rust) could be an indication of corrosion, the service bulletin does not provide a way to determine that corrosion does exist to a level that would compromise the structural integrity of the fitting. Boeing indicates through the service bulletin that a corrosion indication (staining) can exist as long as the fittings are inspected every 300 cycles or up to 18 months. We believe that if staining is found on multiple inspections, then a more detailed inspection should be performed to detect the extent of corrosion.

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UPS proposes Boeing revise Service Bulletin 757-54-0042 dated May 13, 1999 prior to the release of the proposed AD. Since the current Service Bulletin does not provide correct effectivity, parts, process and limits of corrosion removal. A revision to the current service bulletin will provide the FAA and the industry the correct information to ensure the proper inspection and maintain the structural integrity of the aircraft.

UPS appreciates your review and consideration of this matter. If you need further information, Please contact Mark Westman 502-329-6105.

Regards,

Roy Daniel For TONY MCBRIDE

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TM:MW:cj

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